

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 11cr212
v.	)	
	)	Honorable James B. Zagel
CLIFTON WILLIAMS	)	

**MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE**

Defendant CLIFTON WILLIAMS, by the Federal Defender Program and its attorney, MIANGEL CODY, respectfully requests that this Honorable Court enter an order terminating his supervision early. In further support, Mr. Williams states as follows:

1. On July 7, 2009, the United States District court for the Southern District of Texas sentenced Mr. Williams for a violation of 8 U.S.C. § 1324(a)(1)(B)(i), which proscribes transporting an undocumented person within the United States by means of a motor vehicle for private financial gain. The Court imposed a sentence of one year and one day of incarceration, followed by three years' supervised release. Mr. Williams self surrendered and successfully completed his sentence of incarceration.

2. Mr. Williams's supervised release period began in May 2010. He has served over one year of supervision without incident. He now requests an early termination as recognized by the Seventh Circuit Court of Appeals in United States v. Lowe, 632 F.3d 996, 998 (7<sup>th</sup> Cir. 2011) ("A district court may grant an early termination of a remaining term of supervised release after one year of supervised release has elapsed and after the court considers certain factors in 18 U.S.C. § 3553(a), if the defendant's conduct and the interests of justice so warrant.").

3. The factors set forth in 18 U.S.C. § 3553(a) support early termination of supervised release in this case. Since his release, Mr. Williams has been an exemplary supervisee. He has maintained steady employment as a local truck driver for Fore Transportation Services, which is located in Harvey, Illinois. In addition, Mr. Williams has responsibly fulfilled every obligation imposed upon him by the Probation Office. He has completed the 75 hours of court-ordered community service. He has paid his special assessment, and he has no outstanding financial obligations to the Court. Mr. Williams does not have a history of substance abuse or mental health issues, and he does not require ongoing supervision in that regard. He has sustained no new arrests, cases or convictions.

4. Mr. Williams has complied with all of the conditions his release and derived all of the benefits he can from his supervision. He has learned his lesson and, based upon his conduct on supervision thus far, he has demonstrated that the trajectory of his life is toward productive citizenship. There is no further need for him to remain supervised, and to do so would unnecessarily tax the valuable and limited resources of the United States Probation Office. He urges that the limited resources of the United States Probation Office are better utilized by individuals more acutely in need of court supervision.

5. The United States Probation Office, through officer Katina Dean, interposes no objection to this request for early termination of supervised release.

WHEREFORE, for the foregoing reasons, Mr. Clifton Williams respectfully asks the Court to grant this motion for early termination of his supervision.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
Carol Brook  
Executive Director

By: s/ MiAngel Cody  
MiAngel Cody

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**CERTIFICATE OF SERVICE**

The undersigned, MiAngel Cody, an attorney with the Federal Defender Program, hereby certifies that the following document:

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was served on July 12, 2011, in accordance with Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), pursuant to the district court's ECF system as to ECF filers, and was sent by first class mail or by hand delivery to non-ECF filers, if any.

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